

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
)	
GRIDDY ENERGY LLC, ¹)	Case No. 21-30923 (MI)
)	
Debtor.)	
)	

**CERTIFICATE OF COUNSEL REGARDING
MOTION OF THE DEBTOR FOR ENTRY OF AN ORDER
AUTHORIZING RETENTION AND COMPENSATION OF CERTAIN
PROFESSIONALS USED IN THE ORDINARY COURSE OF BUSINESS**

Pursuant to paragraph 42 of the Procedures for Complex Chapter 11 Cases in the Southern District of Texas, the undersigned counsel for the debtor and debtor in possession in the above-captioned case (the “Debtor”) hereby certifies as follows:

1. On March 24, 2021, the Debtor filed the *Motion of Debtor for Entry of an Order Authorizing Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* [Docket No. 69] (the “Motion”). A proposed order granting the relief requested in the Motion was attached to the Motion as Exhibit A [Docket No. 69-1] (the “Original Proposed Order”).

2. A hearing regarding the Motion is scheduled for April 29, 2021 at 9:00 a.m. (prevailing Central time) before the Honorable Marvin Isgur, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of Texas.

3. Responses to the Motion were due April 14, 2021 at 5:00 p.m. (CDT) (the “Objection Deadline”). The Debtor agreed to extend the response deadline for the United States

¹ The last four digits of its federal tax identification number of the Debtor are 1396. The mailing address for the Debtor is PO Box 1288, Greens Farms, CT 06838.

Trustee (“U.S. Trustee”) until April 16, 2021 at 4:00 p.m. (CDT) and for the Official Committee of Unsecured Creditors and the Attorney General for the State of Texas until April 19, 2021 at 4:00 p.m. (CDT).

4. On April 19, 2021, (i) the Attorney General for the State of Texas filed an objection to the Motion (the “Texas Objection”) and (ii) the Official Committee of Unsecured Creditors filed a limited joinder to the Texas Objection (the “UCC Joinder”). Additionally, the Debtor received informal comments from the U.S. Trustee, which it agreed to incorporate into the Motion.

5. More than 24 hours have passed since the Objection Deadline and, except for the U.S. Trustee’s informal comments, the Texas Objection and the UCC Joinder, the undersigned counsel is unaware of any objections to entry to the Motion, and the undersigned counsel has reviewed the Court’s docket and no other objection or response appears thereon.

6. Attached hereto as Exhibit 1, is a revised proposed order (the “Revised Proposed Order”) granting the relief requested in the Motion, as modified by the Revised Proposed Order. Additionally, attached hereto as Exhibit 2, is a redline of the Revised Proposed Order reflecting changes from the Original Proposed Order.

7. The undersigned counsel certifies that the Revised Proposed Order resolves all known objections that the Debtor has received, including specifically the U.S. Trustee’s informal comments, the Texas Objection and the UCC Joinder.

8. The Debtor respectfully requests that the Court enter the attached revised proposed order at the earliest convenience of the Court.

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Dated: April 28, 2021
New York, New York

BAKER BOTTS L.L.P.

By: /s/ Chris Newcomb
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Proposed Counsel to the Debtor and Debtor in Possession

Certificate of Service

I certify that on April 28, 2021, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Chris Newcomb
Chris Newcomb